



**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
vs.)	No: 3:13-cr-00102
)	JUDGE TRAUGER
KENNETH JOHNSON)	

**MOTION REQUESTING A PRE-SENTENCE
INVESTIGATION REPORT PRIOR TO PLEA**

Comes now the defendant, Kenneth Johnson, by and through undersigned counsel, and requests that this Honorable Court to grant the Defendant the opportunity to have a pre-plea Pre-sentence Investigation Report (“PSR”) prepared in this case. This motion is made in accordance with Local Criminal Rule 32.01, and Fed. R. Crim P. 32(c)(1). In support of this Motion, the Defendant submits the following brief memorandum of law. The Government agrees with this Motion.

I. INTRODUCTION

The Defendant is charged in an indictment with being a felon in possession of a weapon. (See docket entry 5). Recently, the Government and the Defendant have engaged in plea negotiations and a plea agreement pursuant to Fed. R. Crim. P 11(c)(1)(C). has been provided to the Defendant. Although the Government and the Defendant believe that the Defendant will fall within a criminal history category III, no assurances of such have been given. Furthermore, and most importantly to the